

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID BURLINGAME

Plaintiff,

-against-

_____ Civ. 1:25-cv--1704 (_____)

MOTION FOR EXTENSION OF TIME IN
WHICH TO FILE BRIEF IN SUPPORT OF
MOTION TO DISMISS

ARGO PRIVATE CLIENT GROUP ET AL.

Defendant.

Now comes Defendants, Argo Private Client Group, Aurora Hill, Ltd., Beechwood Investors Group, LLC, Dan Miller, Allison Miller, Ryan Nelson and Suede Nights LLC, by and through counsel and hereby move this Court to grant a four (4) day extension of time in which to submit the Brief in Support of their Motion to Dismiss, making said brief due on Friday, August 8, 2025. The reason for the request is twofold. First, in their Brief in Opposition, which was filed out of rule on Tuesday, July 29, 2025, Plaintiff includes numerous documents outside the pleadings and makes multiple claims regarding Defendants, including but not limited to Mr. Miller's marital status, claims regarding the transfer of property, claims regarding Mr. Miller and Allison Miller's divorce, claims regarding the location of Aurora Hill, that were not part of the Amended Complaint. These numerous claims, while outside the pleadings, contain statements that are provably false and should this Honorable Court deem the claims worthy of consideration in its deliberations, must be addressed. The second reason for the requested three (3) day extension is that Counsel for the Aurora Hill Defendants is scheduled to litigate a custody / protection order trial on August 5, 2025 and as such will not be able to work on the case that day.

Defendants assert that this motion is not made for the reason of delay, will cause no prejudice to Plaintiff, and is in the interests of justice.

Respectfully Submitted

/s/ Jay F Crook

Jay F Crook #0078499

Jay F Crook Attorney at Law, LLC

PO BOX 965

Willoughby OH 44094

PH: 440-725-6203

EMAIL; jaycrooklaw@outlook.com

CERTIFICATE OF SERVICE

A copy of the foregoing was sent to counsel for all parties through the function of this Court's Electronic filing system.

Respectfully Submitted

/s/ Jay F Crook

Jay F Crook #0078499

Application GRANTED. For future reference, Rule 2.D of the Court's Individual Rules and Practices in Civil Cases requires that all requests for extensions of time be made at least 48 hours prior to the deadline and state whether the adversary consents.

The Clerk of Court is directed to terminate ECF No. 51.

SO ORDERED.



August 5, 2025